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October 19, 2007

Mr. Joe Yun  
California Department of Water Resources  
Division of Planning and Local Assistance  
P.O. Box 942836  
Sacramento, CA 94236-0001

Dear Mr. Yun:

Subject: Proposition 84 Integrated Regional Water Management (IRWM) Guideline Development

On behalf of the Los Angeles Department of Water and Power (LADWP), we are writing in response to your solicitation of comments regarding the development of Proposition 84 Integrated Regional Water Management (IRWM) grant guidelines.

LADWP supplies water to more than 3.8 million residents and businesses in the City of Los Angeles. This year, we face increasing challenges as we manage the Los Angeles water portfolio, including groundwater contamination, and the curtailment of water supply from the Los Angeles Aqueduct and State Water Project. Recognizing that many of our water sources have become less reliable, LADWP is striving to develop local, sustainable water resources to improve the reliability of our supply, and to reduce our dependence on imported water. Our current focus is on developing a broader water supply portfolio emphasizing increased conservation, recycled water, groundwater remediation, and stormwater capture.

We also recognize that some water solutions require regional coordination and investment, and view IRWM as a powerful tool to improve water management. We have been very actively involved in the development of the Greater Los Angeles Integrated Regional Water Management Plan (IRWMP), and are committed to its effective implementation. As such, it is important to us that as this program evolves it builds upon the strengths of the program to date, and becomes an even more effective approach for meeting the water needs of our region.

The following are some specific suggestions for your consideration as you begin to develop the Proposition 84 IRWM Guidelines:

- **The new guidelines should reinforce the highest level of regional coordination.** Lack of clarity about what constitutes a region has confused many in the process, and it threatens to undermine the progress made to date. In the Los Angeles region,

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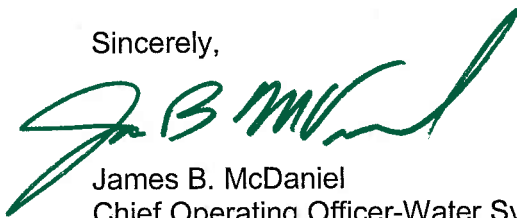
in particular, the California Department of Water Resources (DWR) strongly suggested that what began as five separate efforts, come together to create one plan. Most of those involved have found that this large-scale coordination has brought many benefits and do not want to lose the value of the integration that has occurred. However, some in our region believe that the DWR has kept the door open for sub-regions to go their own way, which would effectively *disintegrate* our region.

- **Funding criteria should include per capita considerations.** Proposition 84 allocated funding to regions in a rough per capita allocation. Consistent with that population-driven intent, the DWR should consider how many people would be served when making funding awards within regions.
- **Continue emphasis on reducing reliance on imported water.** The IRWM program should support plans and projects that help regions reduce their dependence on imported water through improving local water supply reliability.
- **Address climate change.** LADWP is committed to reducing contributions to climate change and managing for adaptability. The IRWM program should support plans and projects that consider climate change consequences.

Thank you for this opportunity to submit comments concerning the development of the Proposition 84 IRWM guidelines. We look forward to working with you as this process moves forward.

If you have any questions, please contact Mr. Thomas M. Erb of my staff at (213) 367-0873.

Sincerely,



James B. McDaniel  
Chief Operating Officer-Water System

TME:jmm

c: Mr. John Woodling, DWR  
Mr. Mark Cowin, DWR  
Ms. Tracie Billington, DWR

Mr. Mark Stuart, DWR  
Mr. Thomas Erb, LADWP